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**CCL Custom Manufacturing, Inc.**  
Martin Street  
Cumberland, RI 02864

May 29, 2002

Mr. Juan Thomas  
Project Manager  
U.S. Environmental Protection Agency  
Region V - 8th Floor - DRE-8J  
77 West Jackson Boulevard  
Chicago, IL 60604-3590

**Re: CCL Custom Manufacturing, Inc.**  
**March, April and May, 2002**  
**Eighth Quarterly Report**  
**V-W-88-C-136/ILD 005 141 726**

Dear Mr. Thomas:

In accordance with U.S. EPA's agreement of June 14, 2000 to modify the reporting frequency from monthly to quarterly, this Eighth Quarterly Report is submitted on behalf of CCL Custom Manufacturing, Inc. This Quarterly Report is submitted in accordance with Section VII of the Administrative Order on Consent as modified by that June written agreement of the parties. This Quarterly Report covers the months of March, April and May, 2002.

**1. Actions which have been taken to achieve compliance -** CCL has continued to effectively operate and maintain both the Perimeter Ground-Water Interceptor and the TTUA Interceptor during the months of March, April and May, 2002. In addition, in accordance with its permit from IEPA, CCL continues to operate an aeration system on the discharge from the Perimeter Ground Water Interceptor to control volatile compound concentrations in its discharge to the local publicly owned treatment plant. Testing has shown that the aeration is effective in controlling volatile levels in that discharge. An air stripper unit treats the TTUA interceptor effluent prior to its discharge to a publicly owned treatment plant. CCL has maintained compliance with its discharge permits for both the Perimeter and TTUA Interceptors through this reporting period.

**2. Results of sampling and other data received by CCL -** CCL did not do, nor was it required to do, any additional sampling pursuant to the Administrative Order on Consent during this quarterly period. Quarterly ground water monitoring is conducted as part of the post-closure care at the facility as required by the IEPA. As part of the routine quarterly monitoring, water levels are measured both up and downgradient of the Perimeter Ground Water Interceptor to demonstrate its continuing

effectiveness. The results of the quarterly ground-water monitoring are provided to EPA under separate cover. CCL also monitors the water quality and flows from the two interceptors for its IEPA and POTW permits. A compilation of that information was provided to EPA in January, 2001 in the revised Corrective Measures Study. If EPA would like that data updated, CCL would be willing to provide such information upon Agency request.

**3. Tasks and actions completed in March, April and May, 2002 and scheduled for the next quarter** - CCL has completed its revised RFI Report and its Corrective Measures Study Report (CMS). The Revised RFI Report has been approved by U.S.EPA; the updated CMS is currently under review by the Agency. Comments on that Report were expected prior to the end of 2001. At this point, it is hoped that comments or approval of the revised CMS will be received at any time.

The original of this CMS was submitted to U.S. EPA approximately two and a half years ago. A revised CMS was provided to the Agency on CCL's own initiative on March 16, 2001. CCL is currently awaiting the results of U.S EPA's review of that document. CCL and EPA met on August 23, 2001 to discuss Site background and how to expeditiously proceed to final resolution of this RFI/CMS project. In addition CCL and EPA met in Danville on October 24<sup>th</sup> to tour the facility and discuss the completion of the CMS process. The parties again agreed that every effort would be made to resolve this matter expeditiously. Since that time, CCL has awaited the Agency's promised response to the revised CMS.

**4. Elements not completed** - CCL did not fail to complete any required site activities during this quarter.

If you have any questions concerning this quarterly report, please feel free to contact us. We look forward to the Agency's response to our Corrective Measures Study.

Very truly,

  
Richard Ferreira

RF:sam  
cc: Jim Tracy  
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